9 October 2013

NOTICE OF VIOLATION

Larry Bright
Valley Water Management Company
7500 Meany Avenue
Bakersfield, CA 93308

CERTIFIED MAIL
7012 2920 0000 1430 3350

INSPECTION REPORT – VALLEY WATER MANAGEMENT COMPANY, RACE TRACK HILL FACILITY, EDISON, KERN COUNTY

Central Valley Regional Water Quality Control Board staff (Staff) inspected the wastewater disposal facility at the Race Track Hill Facility on 18 September 2013. Disposal operations at the facility are regulated by Waste Discharge Requirements Resolution 58-349 (WDRs). Staff's comments and observations are presented in the enclosed inspection report.

Twenty-seven surface impoundments (sumps) were observed on the lease that are used for percolation and evaporation of oil field produced wastewater. The "Entry Sump" has recently been covered with netting to preclude wildlife. The sumps and netting appeared to be in satisfactory condition. Freeboard appeared to be adequate in all of the sumps.

A sprinkler irrigation system is used to irrigate a variety of salt tolerant vegetation to facilitate evapotranspiration of the wastewater. Approximately 94 acres of land on the facility are being irrigated. Sprinklers were operating at the time of the inspection. Waste Discharge Requirements Resolution 58-349 states that wastewater discharged or overflowing onto the surface of the ground needs to conform to the following limits: total dissolved solids cannot exceed 1,000 parts per million (ppm), chlorides cannot exceed 150 ppm, and boron cannot exceed 1.0 ppm.

The wastewater being discharged comes directly from Valley Water Management Company's C-Plant. Analyses of the wastewater at the C-Plant documented the following waste constituent concentrations: electrical conductivity, 5,700 micromhos per centimeter; chloride, 1,800 milligrams per liter (mg/L); and boron, 14 mg/L. The wastewater being sprayed to the ground exceeds the limits permitted by the WDRs. The discharge of wastewater through the sprinkler irrigation system to land is a violation of the WDRs.

Failure to comply with Waste Discharge Requirements Resolution 58-349 can subject you to administrative civil liability (monetary penalties) at a rate up to $10 for each gallon discharged through the sprinkler system which exceeds the waste constituent limitations contained in Resolved 3.a., b. and c. It is important that you promptly comply with the discharge limitations stipulated in Resolution 58-349 to minimize your potential liability pursuant to California Water Code section 13350(e).

If you have any questions, please contact Ryan West at (559) 445-6188 or by email at Ryan.West@waterboards.ca.gov

Dane S. Johnson

DANE S. JOHNSON
Senior Engineering Geologist
PG No. 4239

Enclosure: Inspection Report

cc: Vincent Agusiegbe, CDOG&GR, Bakersfield

5F	5D152013013	**FACILITIES INSPECTION REPORT**	SUB-15	1/4
OFFICE	WDID		PROGRAM	PAGE NO.
58-349	142624		49654	222241
ORDER NO.	REG MEASURE ID		PARTY ID	PLACE ID

VALLEY WATER MANAGEMENT COMPANY		EDISON, RACE TRACK HILL FACILITY	
DISCHARGER NAME		FACILITY NAME	
7500 MEANY AVENUE		W 1/2 OF SECTION 24, T29S, R29E, MDB&M	
STREET ADDRESS		STREET ADDRESS	
BAKERSFIELD, CA 93308		KERN COUNTY	
CITY, STATE, ZIP CODE		CITY, STATE, ZIP CODE	
LARRY BRIGHT		RUSSELL EMERSON	
DISCHARGER CONTACT PERSON		FACILITY CONTACT PERSON	
(661) 410-7500	lbright@vwwater.com	(661) 978-0982	remerson@vwwater.com
TELEPHONE NO.	E-MAIL ADDRESS	TELEPHONE NO.	E-MAIL ADDRESS

GENERAL INSPECTION INFORMATION

Inspection Type: B Type Compliance Inspection Lead Inspector: R. West

9/18/2013 to 09/18/2013	10:45 am	Clear, Sunny
INSPECTION DATE(S)	INSPECTION TIME	GENERAL WEATHER CONDITIONS

INSPECTION ATTENDEE(S)

NAME	COMPANY/AGENCY	TELEPHONE NO.	E-MAIL ADDRESS
Scott Moore	Central Valley Water Board	(559) 445-5170	smoore@waterboards.ca.gov
Russell Emerson	Valley Water Management Co.	(661) 978-0982	remerson@vwwater.com
Mike Toland	CDOGGR	(661) 334-3662	michael.toland@conservation.ca.gov

INSPECTION SUMMARY (for CIWQS entry – 500 character maximum)

The Race Track Hill Facility was inspected to determine compliance with Waste Discharge Requirements Resolution 58-349 (WDRs). There are twenty-seven unlined surface impoundments (sumps) on the facility that are used for percolation and evaporation of oil field production wastewater. A sprinkler irrigation system is used to irrigate a variety of salt tolerant vegetation to facilitate evapotranspiration of the wastewater. Wastewater discharged through the irrigation system exceeds the salinity limits stipulated in the WDRs for discharges onto the surface of the ground.

INSPECTION VIOLATIONS SUMMARY (if applicable)

Identify VIOLATIONS noted during inspection in table below. For each violation documented entered into CIWQS, identify Violation ID and Violation Type, describe violation, and identify section of the WDRs or Water Code violated.

Label	Violation ID	Violation Type	Violation Description	Section of the WDRs Violated
V1	955354	Effluent Violation	Irrigation of wastewater w/ elevated EC, chloride, & boron to ground surface	discharge specification no. 3 (a,b,c)
V2	393289	NOV	Notice of Violation	
V3				
V4				
V5				
V6				

OTHER VIOLATIONS (if applicable)

SMR violations?	☐ Yes ☒ No ☐ Not Evaluated	Notes:
File Review violations?	☐ Yes ☐ No ☐ Not Evaluated	Notes:

Lead Inspector ID: 139472 Signature: Ryan K. West Date: 10/8/13

Inspection Tracking Information Reviewed by: (1) [signature] (2) _____ (3) (RKW) 139472 CIWQS Coordinator

Filename: VWMC, Race Track Hill Facility, Edison, Kern County, Resolution 58-349 CIWQS Entry Date: 09/24/2013 CIWQS Inspection ID: 13834522

FACILITIES INSPECTION REPORT
VALLEY WATER MANAGEMENT COMPANY
RACE TRACK HILL FACILITY, EDISON OIL FIELD

FACILITY INFORMATION

Oil field production wastewater disposal facility.
FACILITY DESCRIPTION (e.g., total area in acres, number of waste management units, etc.)

Active
STATUS (active, inactive, closed)

Oil field production wastewater.
WASTE TYPES

Sub-15 Surface Impoundments
FACILITY CLASSIFICATION

Twenty-seven unlined surface impoundments and sprinkler irrigation system.
DISPOSAL DESCRIPTION (e.g., composting, landfill, surface impoundment, etc.)

BACKGROUND

The Race Track Hill Facility (Figure 1) contains 27 unlined sumps and an irrigation sprinkler system that are used for disposal of wastewater. The wastewater, collected at Valley Water Management Company's C-Plant Facility in the Edison Oil Field, is delivered to the facility by pipeline for disposal. The C-Plant Facility accepts approximately 4.5 million barrels (189 million gallons) of oil field production wastewater per year from several small oil producers in the Edison Oil Field whose wastewater does not meet Basin Plan salinity limits for discharges to unlined sumps. The wastewater contains an electrical conductivity of 5,700 micromhos per centimeter, a chloride concentration of 1,800 milligrams per liter (mg/L), and a boron concentration of 14 mg/L.

INSPECTION GIS DATA

GIS Equipment used: _____ (MANUFACTURER) _____ (MODEL) _____ (SERIAL NO.) _____ (DATUM)

Description of Measured Point	Latitude	Longitude	Datum	Comments
Centroid of Facility	35.392863	-118.821173	NAD 83	

INSPECTION OBSERVATIONS AND FINDINGS

Describe observations and findings and identify those that document and reference each violation listed in the Inspection Violations Summary table by identifying the cited violation number within parentheses following the observation/finding (e.g., Exposed waste on top deck (V1)).

The facility was inspected to observe current wastewater disposal operations and evaluate compliance with the WDRs. Photographs were taken to document observations (see page 4).

There are twenty-seven unlined sumps on the facility that are used for percolation and evaporation of oil field production wastewater. Wastewater is gravity fed from one sump to the next in a downhill series. Netting was recently constructed over the "Entry Sump" to prevent wildlife from contacting crude oil in the sump (Photograph 1). A vacuum truck operator was on-site cleaning crude oil out of the north-east corner of Sump 2 (Photograph 2). Mr. Emerson (Valley Water Management Company) stated that vacuum trucks are used on a frequent basis as part of regular facility maintenance. Crude oil was not observed in the remainder of the sumps (Photographs 3 and 5). A few of the sumps did not contain wastewater (Photograph 6).

A sprinkler irrigation system is used to irrigate a variety of salt tolerant vegetation to facilitate evapotranspiration of the wastewater. Approximately 94 acres of land on the facility are irrigated (see Figure 1). Sprinklers were operating at the time of the inspection (Photograph 4).

SAMPLING INFORMATION AND OBSERVATIONS

Were samples collected during the inspection? ☐ Yes ☒ No Are sample results included in report? ☐ Yes ☒ No

Did discharger collect split samples? ☐ Yes ☒ No

SAMPLE COLLECTION INFORMATION AND OBSERVATIONS

SAMPLE ID	SAMPLE DESCRIPTION/OBSERVATIONS	SAMPLE TIME (hours)	PHOTO NO.
SAMPLE ID	SAMPLE DESCRIPTION/OBSERVATIONS	SAMPLE TIME (hours)	PHOTO NO.
SAMPLE ID	SAMPLE DESCRIPTION/OBSERVATIONS	SAMPLE TIME (hours)	PHOTO NO.
SAMPLE ID	SAMPLE DESCRIPTION/OBSERVATIONS	SAMPLE TIME (hours)	PHOTO NO.

DISCUSSION OF SAMPLING RESULTS

Discuss sampling results (e.g., discuss whether sampling results show compliance with WDRs).

CONCLUSIONS

Summarize the conclusions of the inspection(s) below.

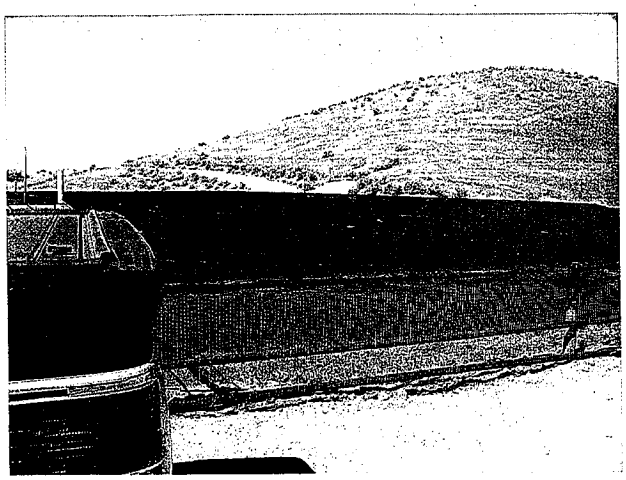
1. The "Entry Sump" has recently been covered with netting to preclude wildlife. This resolves the Notice of Violation dated 10 July 2012 issued to Valley Water Management Company.

2. A sprinkler irrigation system is used to irrigate a variety of salt tolerant vegetation to facilitate evapotranspiration of the wastewater. Approximately 94 acres of land on the facility are irrigated. Sprinklers were operating at the time of the inspection. Waste Discharge Requirements Resolution 58-349 states that wastewater discharged or overflowing onto the surface of the ground, or into natural drainage channels or into unlined sumps other than those constructed in Section 24, T29S, R29E, MDB&M shall conform to the following criteria: total dissolved solids cannot exceed 1,000 parts per million (ppm), chlorides cannot exceed 150 ppm, and boron cannot exceed 1.0 ppm. Facility wastewater exceeds these criteria.

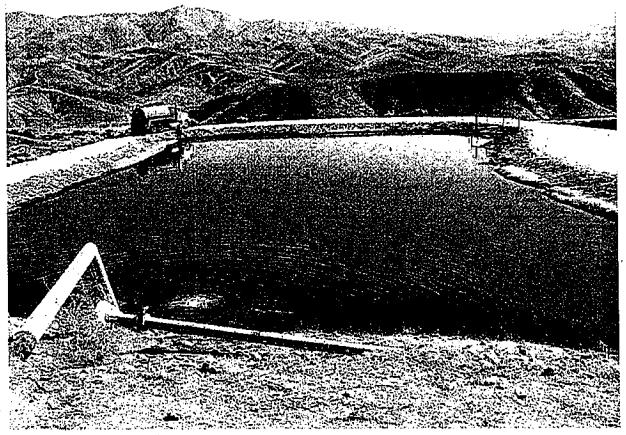
3. The disposal of wastewater through the sprinkler irrigation system is in violation of the WDRs and needs to cease.

4. The WDRs are outdated and need to be updated for conformance with current Central Valley Water Board policies, and State regulations and policies.

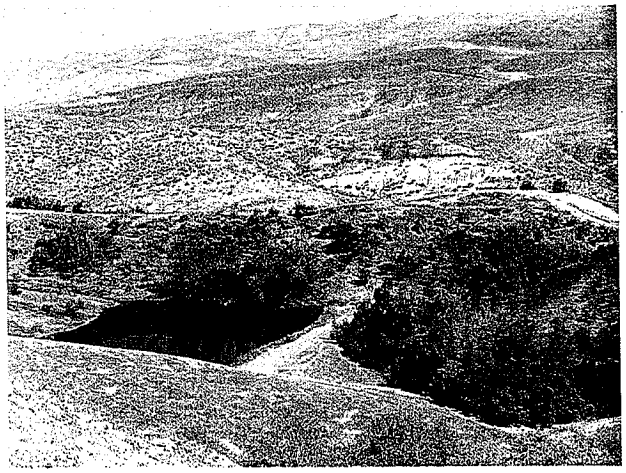
PHOTOGRAPHS



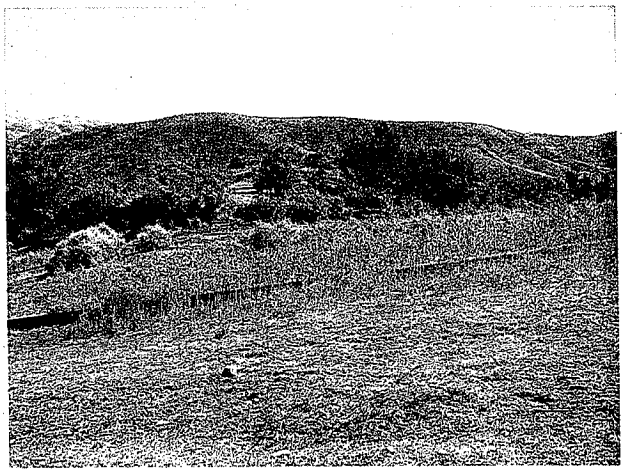
Photograph 1. – View of netting recently constructed over the "Entry Sump."



Photograph 2. – View of vacuum truck removing a small amount of crude oil in NE corner of Sump 2.

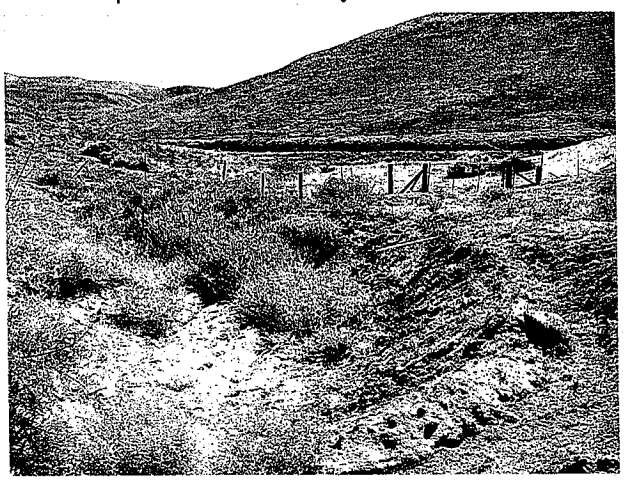


Photograph 3. – View of a few sumps on the northern portion of the facility.

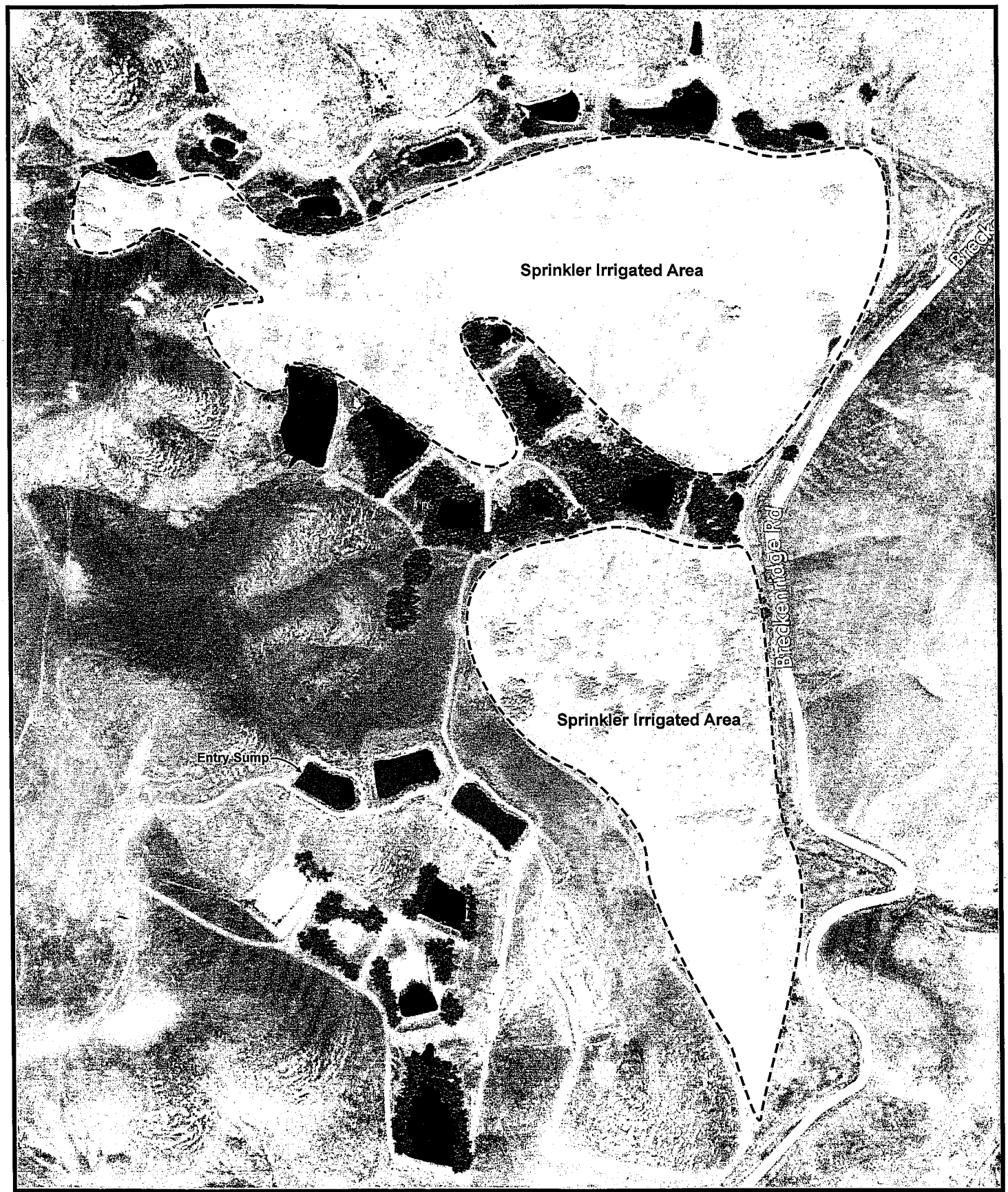


Photograph 4. – View of a sprinklers irrigating an area on the northern portion of the facility.

Photograph 5. – View of the elevated berm on Sump 26.



Photograph 6. – View of the last sump in the series (Sump 27). Breckenridge road in the background.



Map Source:
ESRI's ArcGIS Online Premium Services
Section 24, T29S, R29E, MDB&M

SCALE IN FEET
0 200 400

SITE MAP

RESOLUTION 58-349

VALLEY WATER MANAGEMENT COMPANY

EDISON (RACETRACK HILL - SEC24) FACILITY

KERN COUNTY

FIGURE 1